TIERRA SOLUTIONS, INC. SM

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November 18, 2016

United States Environmental Protection Agency
Region II
Emergency and Remedial Response Division
Diamond Alkali Superfund Site
290 Broadway, 19th Floor, Room W-20
New York, NY 10007-1866
Attention: Ms. Elizabeth Butler, Remedial Project Manager

Re: Monthly Progress Report No. 323
Diamond Alkali Superfund Site
Newark, New Jersey
Work Period: October 2016

Dear Ms. Butler:

On behalf of Occidental Chemical Corporation, submitted herewith is one (1) copy of Monthly Progress Report No. 323 for work performed during October 2016 at the Diamond Alkali Superfund Site in Newark, New Jersey. This progress report has been prepared pursuant with Section XIV.A of the Consent Decree between United States of America, The State of New Jersey, and Occidental Chemical Corporation, Civil Action No. 89-5064 (JWB) (United States District Court for the District of New Jersey).

Please call me at 732/579-7586 if you have any questions regarding this matter.

Sincerely,

Enrique Castro for

Brian Mikucki
On behalf of Occidental Chemical Corporation
(as successor to Diamond Shamrock Chemicals Company)

Enclosures

Enclosures

1c: Chief, New Jersey Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency
Region II
290 Broadway, 17th Floor
New York, NY 10007-1866
Attention: Diamond Alkali Site Attorney

3c: New Jersey Department of Environmental Protection
Bureau of Case Management, Site Remediation Program
Mail Code 401-05F
P.O. Box 420
Trenton, NJ 08625-0420
Attention: Mr. Jay Nickerson

1c: Glenn Springs Holdings, Inc.
5 Greenway Plaza, Suite 110
Houston, TX 77046
Attention: Juan Somoano

**MONTHLY PROGRESS REPORT NO. 323**
**DIAMOND ALKALI SUPERFUND SITE**
**NEWARK, NEW JERSEY**
**WORK PERIOD: October 2016**



(1) Work Performed:

(a) Tierra Solutions, Inc. (Tierra) performed operation and maintenance (O&M) activities at the Diamond Alkali Superfund Site (the Site) in accordance with the United States Environmental Protection Agency- (USEPA) approved *Operation and Maintenance Plan* (O&M Plan, Attachment G of the *Final Modified (100%) Remedial Design Report*).

(b) Inspection and monitoring activities, as required by Sections 10 through 12 in the O&M Plan, were conducted at the Site on October 10, 2016. A checklist of the inspection and monitoring activities performed at the Site during October 2016 is included in Appendix A to this report.

(c) Tierra submitted the September 2016 Monthly Report and Discharge Monitoring Report to the USEPA on October 20, 2016.

(d) Continued to operate the Groundwater Withdrawal System (GWWS) and Groundwater Treatment System (GWTS).

(e) Effluent and process samples were collected as required. The GWTS began direct discharge to the Passaic River during the month of April 2014.

(2) Potential and/or Actual Noncompliances or Problems Encountered:

(a) None during this reporting period.

(3) Corrective Actions:

(a) None during this reporting period.

(4) Final Results of Sampling or Testing:

(a) Methane gas monitoring results for October 2016 are reported in Appendix B.

(b) Groundwater level measurements for October 2016 are reported in Appendix B.

(c) Validated effluent analytical results for October 2016 are reported in Appendix B.

(5) Future Work Scheduled:

(a) Continue to operate and monitor the GWWS, GWTS, and sand layer drainage collection system.

(b) Inspection and monitoring activities will be performed at the Site in accordance with Sections 10 through 12 in the O&M Plan.

(c) Effluent and process samples will continue to be collected, as required.

(d) Treated effluent from the GWTS will continue to be discharged to the Passaic River.

(e) Evaluate corrective measures to restore/repair piping from EW-9 to common header.

(6) Work Completion Estimates, Delays, and Mitigation Actions:

(a) Work Completion Estimates:

i. Mobilization / Site preparation – 100% complete

ii. Slurry wall construction – 100% complete

iii. Floodwall construction – 100% complete

iv. Demolition of Structures – 100% complete

v. Handling of shipping containers – 100% complete

vi. Stabilization of drum and tank contents – 100% complete

vii. Underground conduit sealing – 100% complete

viii. Placement of secured materials construction – 100% complete

ix. Groundwater withdrawal system – 100% complete

x. Groundwater treatment system – 100% complete

xi. Surficial Cap – 100% complete

xii. Attainment of Hydraulic Gradient – 100% complete

xiii. Demobilization – 100% complete

xiv. Final Report for Remedial Construction – 100% complete

xv. USEPA Approval of Final Report for Remedial Constru ction – 100% complete

xvi. Preparation of REWP – 100% complete

xvii. USEPA Approval of QAPP for the Groundwater Quality Monitoring Program – 100% complete

xviii. USEPA Approval of REWP – 100% complete

xix. USEPA Approval of Revisions to SAMP and QAPP Associ ated with the Operations and Maintenance Plan – 100% complete

xx. Preparation of RER – 100% complete

xxi. USEPA Approval of RER – 0% complete

(b) Delays and Mitigation Actions – None.

# Appendix A

**Monthly Inspection Checklist**
**Diamond Alkali Superfund Site**
**Newark, New Jersey**

Date: 10/10/2016 Representative: Ryan Adair

| | Description | Yes | No | Actions | Comments |
|---|---|---|---|---|---|
| 1 | Floodwall, curbwall, and fencing along curbwall intact? | X | | No maintenance required | None |
| 2 | Perimeter and interior drains open and functional? | X | | No maintenance required | None |
| 3 | Gabions intact? | X | | No maintenance required | None |
| 4 | Perimeter fence intact? | X | | No maintenance required | None |
| 5 | Entry gates intact? | X | | No maintenance required | None |
| 6 | Paved and gravel roadways intact? | X | | No maintenance required | None |
| 7 | Piezometers and gas vents intact? | X | | No maintenance required | None |
| 8 | Surficial cap surface intact and no signs of significant ponding? | X | | No maintenance required | None |
| 9 | Extraction well chambers and interior piping intact? | X | | No maintenance required | None |
| 10 | Secondary containment intact for Tank T-1? | X | | No maintenance required | None |
| 11 | Tanks T-1 and T-8 and associated aboveground piping intact? | X | | No maintenance required | None |
| 12 | Stormwater management controls operating properly? | X | | No maintenance required | None |
| 13 | Sand Layer Drainage Collection System- Trench drains & Weirs | X | | No maintenance required | None |
| 14 | Sand Layer Drainage Collection System- Aboveground piping (floodwall & to GWTP) | X | | No maintenance required | None |
| 15 | Bubbler system operating properly for effluent tank? | NA | | No maintenance required | Frac tanks are no longer in use for storage of treated effluent |
| 16 | Effluent tanks locked appropriately? | X | | No maintenance required | None |
| 17 | Exterior of groundwater treatment system building intact? | X | | No maintenance required | None |
| 18 | Interior of groundwater treatment system building intact? | X | | No maintenance required | None |
| 19 | Secondary containment inside the groundwater treatment system building intact? | X | | No maintenance required | None |
| 20 | Floor sealant inside the groundwater treatment system building intact? | X | | No maintenance required | None |
| 21 | Sump pumps inside the groundwater treatment system building operating properly? | X | | No maintenance required | None |
| 22 | Containers stored in the residual storage area intact? | X | | No maintenance required | None |
| 23 | Groundwater measurements taken for piezometers and extraction wells? | X | | No maintenance required | Collected on 10/10/16 |
| 24 | Groundwater measurements taken from vibrating wire piezometers? | NA | | No maintenance required | No Longer Collect vibrating Wire data |
| 25 | Gas vents monitored for the presence of methane gas (inspect monthly)? | X | | No maintenance required | Collected on 10/10/16 |
| 26 | Automated security system functioning properly (inspect monthly)? | X | | No maintenance required | None |
| 27 | Floodwall visually observed with no observations of cracking, deterioration nor damage? | X | | No maintenance required | As observed from the site |

**Monthly Inspection of Interior Rooms Inside the Groundwater Treatment Building**
**Diamond Alkali Superfund Site**
**Newark, New Jersey**

1. ***Residual Storage Area***
   No issues observed, no maintenance required.
   **Odor Check**: Normal Conditions

2 **Laboratory**
   No issues observed, no maintenance required.
   **Odor Check**: Normal Conditions

3. ***Sludge Room***
   No issues observed, no maintenance required.
   **Odor Check**: Normal Conditions

4. ***Bathroom***
   No issues observed, no maintenance required.
   **Odor Check**: Normal Conditions

5. ***Locker Room***
   No issues observed, no maintenance required.
   **Odor Check**: Normal Conditions

6. ***Decontamination Area***
   No issues observed, no maintenance required.
   **Odor Check**: Normal Conditions

7. ***Control Room/Office/Hallway***
   No issues observed, no maintenance required.
   **Odor Check**: Normal Conditions

8. ***Process Area***
   No issues observed, no maintenance required.
   **Odor Check**: Normal Conditions

No issues observed, no maintenance required.

Date: 10/10/16 Personnel: Ryan Adair

# Appendix B

# Methane Gas Monitoring Summary
# Diamond Alkali Superfund Site
# Newark, New Jersey

## October 2016

| Gas Vent | Location | CGI Reading | | | | FID Reading (ppm) | | | PID Reading (ppm) |
|---|---|---|---|---|---|---|---|---|---|
| | | CO | H2S | LEL | OXY | Initial | 1min | 2 min | Initial |
| GV-1 | NW corner- along adjacent property 0.0 | | 0.0 | 0.0 | 20.9 | 0.0 | NM | NM | 0.0 |
| GV-2 | NW corner- along Passaic River | 0.0 | 0.0 | 0.0 | 20.9 | 0.0 | NM | NM | 0.0 |
| GV-3 | Along Passaic River- center of lot | 0.0 | 0.0 | 0.0 | 20.9 | 52.6 | 16.5 | 0.0 | 0.0 |
| GV-4 | NE corner | 0.0 | 0.0 | 0.0 | 20.9 | 34.7 | 8.7 | 0.0 | 0.0 |
| GV-5 | W property line- center | 0.0 | 0.0 | 0.0 | 20.9 | 0.0 | NM | NM | 0.0 |
| GV-6 | Top of cap- NW end | 0.0 | 0.0 | 0.0 | 20.9 | 222.4 | 100.6 | 9.3 | 0.0 |
| GV-7 | Top of cap- center | 0.0 | 0.0 | 0.0 | 20.9 | 444.7 | 79.8 | 17.6 | 0.0 |
| GV-8 | Top of cap- E end | 0.0 | 0.0 | 0.0 | 20.9 | 14.4 | 0.0 | 0.0 | 0.0 |
| GV-9 | Corner of GWTP and T-8 | 0.0 | 0.0 | 0.0 | 20.9 | 0.0 | NM | NM | 0.0 |
| GV-10 | Behind T-8 | 0.0 | 0.0 | 0.0 | 20.9 | 0.0 | NM | NM | 0.0 |
| GV-11 | Between T-8 and T-1 | 0.0 | 0.0 | 0.0 | 20.9 | 0.0 | NM | NM | 0.0 |
| GV-12 | SW property line- W corner | 0.0 | 0.0 | 0.0 | 20.9 | 0.0 | NM | NM | 0.0 |
| GV-13 | SW property line- center | 0.0 | 0.0 | 0.0 | 20.9 | 0.0 | NM | NM | 0.0 |
| GV-14 | SE corner of GWTP | 0.0 | 0.0 | 0.0 | 20.9 | 0.0 | NM | NM | 0.0 |

**Notes:**

1. Combustible Gas Indicator (CGI) and Photoionization Detector (PID) was a MultiRae Plus from US Environmental
2. Flame Ionization Detector (FID) was a Photovac MicroFID from US Environmental
3. FID readings were not required at 1 minute and 2 minutes after if the presence of gas was not detected initially.
4. Methane gas monitoring performed on Oct 10, 2016.

**Diamond Alkali Superfund Site**
**Newark, New Jersey**

Summary of Groundwater Levels in Piezometers
Oct-16

| Well ID | | GCP 1-1 | GCP 2-1 | GCP 3-1 | GCP 4-1 | GCP 5-1 | GCP 6-1 | GCP 7-1 | GCP 8-1 | GCP 9-1 |
|---|---|---|---|---|---|---|---|---|---|---|
| 8/31/2009 TOIC Elevation* | | 14.14 | 15.72 | 13.86 | 12.90 | 12.86 | 14.17 | 13.84 | 13.76 | 15.07 |
| Depth to Water (ft btoc) | | 12.79 | 14.52 | 11.84 | 10.07 | 10.19 | 11.33 | 10.90 | 10.80 | 12.77 |
| Total Depth | | 23.97 | 27.54 | 24.34 | 13.77 | 12.73 | 15.18 | 13.96 | 14.61 | 16.03 |
| Monitoring Date | Monitoring Time | Groundwater Elevations | | | | | | | | |
| 10/10/2016 | 12:05 - 13:49 | 1.35 | 1.20 | 2.02 | 2.83 | 2.67 | 2.84 | 2.94 | 2.96 | 2.30 |

| Well ID | | GCP 1-2 | GCP 3-2 | GCP 4-2 | GCP 5-2 | GCP 6-2 | GCP 7-2 | GCP 8-2 | GCP 9-2 |
|---|---|---|---|---|---|---|---|---|---|
| 8/31/2009 TOIC Elevation* | | 14.06 | 13.78 | 12.38 | 12.91 | 13.37 | 13.55 | 12.62 | 11.98 |
| Depth to Water (ft btoc) | | 12.12 | 12.14 | 9.26 | 7.73 | 11.72 | 10.40 | 9.30 | 7.91 |
| Total Depth | | 43.69 | 43.68 | 13.70 | 12.64 | 43.55 | 14.40 | 13.00 | 13.11 |
| Monitoring Date | Monitoring Time | Groundwater Elevations | | | | | | | |
| 10/10/2016 | 12:05 - 13:49 | 1.94 | 1.64 | 3.12 | 5.18 | 1.65 | 3.15 | 3.32 | 4.07 |

| Well ID | | GCP 6-3 | GCP 8-3 | IP-1 | IP-2 | IP-3 | IP-4 | IP-5 | IP-6 |
|---|---|---|---|---|---|---|---|---|---|
| 8/31/2009 TOIC Elevation* | | 13.24 | 12.96 | | | | | 23.17 | 22.65 |
| Depth to Water (ft btoc) | | 9.58 | 11.25 | 0.00 | 0.00 | 0.00 | 0.00 | 20.39 | 19.79 |
| Total Depth | | 14.28 | 40.80 | na | na | na | na | 24.00 | 24.01 |
| Monitoring Date | Monitoring Time | Groundwater Elevations | | | | | | | |
| 10/10/2016 | 12:05 - 13:49 | 3.66 | 1.71 | 0.00 | 0.00 | 0.00 | 0.00 | 2.78 | 2.86 |

**Notes:**
* - TOIC is refrenced to final PVC riser pipe elevations surveyed on August 31, 2009 by DPK Consulting
Elevations refer to groundwater levels in monitoring wells and piezometer based on NGVD 29 in feet above mean sea level (ft-amsl).
The depths of GCP 6-2 and GCP 6-3 differ from the design drawings. GCP 6-2 is screened in the glaciofluvial sand and GCP 6-3 is screened in fill material.
"-" means no reading.
"na" - not applicable. These four points are Vibrating Wire Piezometers and are sealed in place beneath the cap layers.
"btoc" - Below Top of Casing

# OCTOBER 2016 SUPPLEMENTAL TABLE FOR MONTHLY DISCHARGE MONITORING REPORT
## DIAMOND ALKALI SUPERFUND SITE
## NEWARK, NEW JERSEY

| Constituent | Permit Limitation | | Sample ID: | W-TSI-EFF-100316 | W-TSI-EFF-DUP-100316 | TB-100316-703R |
|---|---|---|---|---|---|---|
| | | | Sample Date: | 10/3/2016 | 10/3/2016 | 10/3/2016 |
| | Monthly Avg. | Daily Max | SDG Number: Units | LISTER703R | LISTER703R | LISTER703R |
| Total Suspended Solids(TSS) | 30 | 50 | mg/l | 10 U | 10 U | – |
| Total Organic Carbon (TOC) | -- | 40 | mg/l | 1.0 U | 1.0 U | – |
| Petroleum Hydrocarbons | 10 | 15 | mg/l | 5.0 UJL | 5.0 UJL | – |
| pH | -- | 6 - 9 | SU | 8.1 | 8.30 | – |
| 2,4,6-Trichlorophenol | 115 | 260 | µg/l | 5.0 U | 5.0 U | – |
| 2-Chlorophenol | 35 | 125 | µg/l | 5.0 U | 5.0 U | – |
| 2,4-Dichlorophenol | 23 | 150 | µg/l | 5.0 U | 5.0 U | – |
| Phenol | 23 | 40 | µg/l | 23 U | 23 U | – |
| 1,2,4-Trichlorobenzene | 45 | 90 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| Hexachlorobenzene | 22 | 40 | µg/l | 22 U | 22 U | – |
| 1,2-Dichlorobenzene | 40 | 110 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| 1,3-Dichlorobenzene | 25 | 35 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| 1,4-Dichlorobenzene | 18 | 45 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| Fluoranthene | -- | 16 | µg/l | 10 U | 10 U | – |
| Naphthalene | 35 | 105 | µg/l | 5.0 U | 5.0 U | – |
| Phenanthrene | 35 | 105 | µg/l | 5.0 U | 5.0 U | – |
| Benzene | 21 | 57 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| Chlorobenzene | 23 | 45 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| 1,2-Dichloroethane | 30 | 85 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| 1,1,1-Trichloroethane | 25 | 65 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| 1,1-Dichloroethane | 25 | 65 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| Chloroform | 20 | 40 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| 1,2-Dichloroethene (Total) | 25 | 65 | µg/l | 5.0 U | 5.0 U | – |
| trans-1,2-Dichloroethene | 25 | 65 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| Ethylbenzene | -- | 430 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| Toluene | 18 | 35 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| Trichloroethene | 25 | 65 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| Vinyl Chloride | 25 | 65 | µg/l | 5.0 U | 5.0 U | 5.0 U |
| 4,4-DDT | -- | 0.34 | µg/l | 0.34 UJ | 0.34 UJ | – |
| 4,4-DDE | -- | 14 | µg/l | 0.35 UJ | 0.35 UJ | – |
| Endosulfan I | 32 | 90 | µg/l | 0.05 UJ | 0.05 UJ | – |
| 2,4-D | 1,500 | 3,300 | µg/l | 11 R | 11 U | – |
| 2,4-DB | 17 | 25 | µg/l | 16 UJ | 16 UJ | – |
| Dinoseb (DNBP) | 420 | 790 | µg/l | 1.6 U | 1.6 U | – |
| Dioxin (2,3,7,8-TCDD) | -- | 0.000081 | µg/l | 0.000081 U | 0.000081 U | – |
| Total Recoverable Antimony | 200 | 305 | µg/l | 60 U | 60 U | – |
| Total Recoverable Arsenic | 50 | 115 | µg/l | 10 U | 10 U | – |
| Total Recoverable Beryllium | -- | 8.6 | µg/l | 8.6 U | 8.6 U | – |
| Total Recoverable Cadmium | -- | 31 | µg/l | 31 U | 31 U | – |
| Hexavalent Chromium | -- | 66 | µg/l | 66 U | 66 U | – |
| Trivalent Chromium | -- | 44 | µg/l | 44 U | 44 U | – |
| Total Recoverable Copper | -- | 62 | µg/l | 62 U | 62 U | – |
| Total Recoverable Lead | -- | 18 | µg/l | 18 U | 18 U | – |
| Total Recoverable Mercury | -- | 3.4 | µg/l | 3.4 U | 3.4 U | – |
| Total Recoverable Nickel | -- | 73 | µg/l | 73 U | 73 U | – |
| Total Recoverable Silver | -- | 69 | µg/l | 69 U | 69 U | – |
| Total Recoverable Zinc | -- | 47 | µg/l | 47 U | 47 U | – |
| Total Cyanide | -- | 78 | µg/l | 78 U | 78 U | – |

Notes:
mg/l - Milligrams/liter
µg/l - Micrograms/liter
SU - Standard units
-- - Not analyzed or not applicable
U - Constituent was not detected above the associated detection limit
UJ - The material was analyzed for, but was not detected. The sample quantitation limit is an estimated quantity.
UJL - The material was analyzed for, but was not detected. The sample quantitation limit is an estimated quantity.
R - The data are unusable (compound may or may not be present).
Trivalent Chromium Concentration is calculated based on the total and hexavalent chromium results.

# Appendix C

**SUMMARY FOR THE SUBMISSION TO THE COURT**
**MONTHLY PROGRESS REPORT NO. 323**
**DIAMOND ALKALI SUPERFUND SITE**
**NEWARK, NEW JERSEY**
**WORK PERIOD: OCTOBER 2016**



(1) Work Performed:

(a) Tierra Solutions, Inc. (Tierra) performed operation and maintenance (O&M) activities at the Diamond Alkali Superfund Site (the Site) in accordance with the United States Environmental Protection Agency- (USEPA) approved *Operation and Maintenance Plan* (O&M Plan, Attachment G of the *Final Modified (100%) Remedial Design Report*).

(b) Inspection and monitoring activities, as required by Sections 10 through 12 in the O&M Plan, were conducted at the Site on October 10, 2016. A checklist of the inspection and monitoring activities performed at the Site during October 2016 is included in Appendix A to this report.

(c) Tierra submitted the September 2016 Monthly Report and Discharge Monitoring Report to the USEPA on October 20, 2016.

(d) Continued to operate the Groundwater Withdrawal System (GWWS) and Groundwater Treatment System (GWTS).

(e) Effluent and process samples were collected as required. The GWTS began direct discharge to the Passaic River during the month of April 2014.

(2) Potential and/or Actual Noncompliances or Problems Encountered:

(a) During evaluation of EW-9 well flow restriction it was determined that the piping from EW-9 to the common header is blocked with scale/sediment.

(3) Corrective Actions:

(a) Evaluate corrective measures to restore/repair piping from EW-9 to common header.

(4) Final Results of Sampling or Testing:

(a) Methane gas monitoring results for October 2016 are reported in Appendix B.

(b) Groundwater level measurements for October 2016 are reported in Appendix B.

(c) Validated effluent analytical results for October 2016 are reported in Appendix B.

(5) Future Work Scheduled:

(a) Continue to operate and monitor the GWWS, GWTS, and sand layer drainage collection system.

(b) Inspection and monitoring activities will be perfor med at the Site in accordance with Sections 10 through 12 in the O&M Plan.

(c) Effluent and process samples will continue to be collected, as required.

(d) Treated effluent from the GWTS will continue to be discharged to the Passaic River.

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(a) Work Completion Estimates:

i. Mobilization / Site preparation – 100% complete

ii. Slurry wall construction – 100% complete

iii. Floodwall construction – 100% complete

iv. Demolition of Structures – 100% complete

v. Handling of shipping containers – 100% complete

vi. Stabilization of drum and tank contents – 100% complete

vii. Underground conduit sealing – 100% complete

viii. Placement of secured materials construction – 100% complete

ix. Groundwater withdrawal system – 100% complete

x. Groundwater treatment system – 100% complete

xi. Surficial Cap – 100% complete

xii. Attainment of Hydraulic Gradient – 100% complete

xiii. Demobilization – 100% complete

xiv. Final Report for Remedial Construction – 100% complete

xv. USEPA Approval of Final Report for Remedial Construction – 100% complete

xvi. Preparation of REWP – 100% complete

xvii. USEPA Approval of QAPP for the Groundwater Quality Monitoring Program – 100% complete

xviii. USEPA Approval of REWP – 100% complete

xix. USEPA Approval of Revisions to SAMP and QAPP Associated with the Operations and Maintenance Plan – 100% complete

xx. Preparation of RER – 100% complete

xxi. USEPA Approval of RER – 0% complete

(b) Delays and Mitigation Actions – None.